



THE CITY OF NEW YORK
LAW DEPARTMENT
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Hon. Sylvia O. Hinds-Radix
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May 8, 2023

BY ECF

Honorable Steven L. Tiscione
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: William R. Nolan v. City of New York, et. al.
19-CV-00187 (RPK)(ST)

Dear Judge Tiscione:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York.¹ I submit this letter on behalf of Defendant City of New York to seek additional time to respond to the Amended Complaint.²

As your Honor is aware, while this case was filed in January 2019, the matter has been stayed for several years pending resolution of the NYPD Internal Affairs Bureau's investigation and the criminal charges against Plaintiff. After several requests to extend Plaintiff's time to file an amended complaint, the Amended Complaint was filed on April 24, 2023.

¹ The undersigned first appeared on behalf of the City of New York on March 3, 2023, after the case was transferred from former Assistant Corporation Counsel Jacqueline Hui.

² The Amended Complaint also names seven employees (or former employees) of the New York City Police Department as defendants in their individual and official capacities. Defendants Police Detective James Butler and Police Officer Bryan Burgess were not named as defendants in the original Complaint.

The Amended Complaint contains one hundred seventy-seven (“177”) paragraphs and eleven (“11”) causes of action stemming from an alleged series of incidents beginning in 2017. Specifically, Plaintiff alleges that his complaints to the New York City Police Department (“NYPD”) regarding the alleged harassing conduct of Defendant Jose Rodriguez went unanswered and that the NYPD engaged in a number of retaliatory actions against Plaintiff, including suspension of his handgun license, confiscation of said license and associated handguns, and a December 20, 2018 arrest.

Given the fact-intensive nature of the Amended Complaint that spans several years, the City of New York is requesting additional time to respond. Accordingly, I respectfully request that the Court extend the City of New York’s time to answer to July 10, 2023. I have obtained counsel for Plaintiff’s consent to this request.

Thank you in advance for your consideration of this matter.

Respectfully submitted,


Nicholas Ciappetta
Senior Counsel